

EXHIBIT 1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY
3 CAMDEN VICINAGE

4 *****
5 IN RE: VALSARTAN, LOSARTAN, MDL No. 2875
6 AND IRBESARTAN PRODUCTS
7 LIABILITY LITIGATION Civil No.
8 *****
9 THIS DOCUMENT APPLIES TO ALL 19-2875
10 CASES HON ROBERT B.
11 ***** KUGLER

12 - CONFIDENTIAL INFORMATION -
13 SUBJECT TO PROTECTIVE ORDER

14 Remote Videotaped via Zoom Deposition of
15 JUCAI GE, commencing at 7:13 a.m. China Standard Time,
16 on the 27th of April, 2021, before Juliana F. Zajicek,
17 Registered Professional Reporter, Certified Shorthand
18 Reporter and Certified Realtime Reporter.

19
20 GOLKOW LITIGATION SERVICES
21 877.370.3377 ph | 917.591.5672 fax
22 dep@golkow.com
23
24

1 entire career at Zhejiang Huahai Pharmaceutical
2 Company since you graduated from college, is that
3 right?

4 A. I have been with Zhejiang Huahai
5 Pharmaceutical Company since I graduated from college.

6 Q. Now, going back to your college career,
7 can you describe for me what sort of coursework is
8 entailed in undertaking a degree in industrial
9 engineering?

10 A. For example, some mechanical design
11 courses, as well as obtaining some knowledge on
12 quality assurance. In addition, some basic or simple
13 chemical engineering knowledge.

14 Q. Was your degree in industrial engineering
15 specific to pharmaceutical drug products?

16 A. It was closely related to the
17 pharmaceutical drug products because for the
18 mechanical design courses, most of the devices were
19 chemical engineering devices.

20 Q. When you joined Zhejiang Huahai
21 Pharmaceutical Company in July of 2000, how many drug
22 products was the company manufacturing and marketing
23 in that year, to the best of your recollection?

24 A. I don't recall the specifics.

1 responsible for creating job descriptions in English
2 and -- and providing them to the FDA?

3 A. I don't know that either.

4 Q. In the course of your job as the quality
5 assurance director at the Chuannan facility and in
6 response -- as being responsible for all APIs, if you
7 needed something to be translated into English, who
8 would you speak to about facilitating that
9 translation?

10 A. It depends on the nature of the documents.
11 For example, there are some simple documents, but
12 since we do not have a specific department that's for
13 professional translation into English, my answer is it
14 depends on the nature of the documents.

15 Q. So Zhejiang Huahai Pharmaceutical Company
16 has no specific department that's dedicated to
17 professional translation into English?

18 A. To the best of my understanding, no.

19 Q. Now, I'll represent that -- that this
20 document was referenced in an inspection that was
21 conducted by the Food and Drug Administration in 2018.

22 Do you recall the inspection that was
23 conducted at the Chuannan facility in 2018?

24 A. What do you mean by do I recall? What

1 Q. Since you have been the quality assurance
2 director at Chuannan, please name all of the persons
3 who are responsible for backing up electronic data
4 stored in the quality assurance department at
5 Chuannan.

6 A. As it is stated very clear in my personal
7 resume, I started to act as the quality assurance
8 department director since 2011. Since it covers a
9 long period of time, I do not recall the names.

10 Q. How about since you became the QA director
11 of the API division for the persons at Chuannan
12 responsible for backing up all electronic documents
13 stored in the quality assurance department at
14 Chuannan?

15 A. Are you referring to the time since 2018?

16 Q. Yes.

17 A. As I stated earlier, it was Weili Xu that
18 would manage the documents at Chuannan site.
19 Likewise, it was also her that would contact the IT
20 department for the backup.

21 Q. This Section 6.12.1 also dictates that all
22 "backups must be locked and kept by a designated
23 person."

24 Since 2018 has Chuannan been keeping all